

UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY

<b>IN RE VALSARTAN, LOSARTAN, AND IRBESARTAN PRODUCTS LIABILITY LITIGATION</b>	<b>MDL No. 2875</b>
<b>THIS DOCUMENT RELATES TO ALL CASES</b>	<b>HON. ROBERT B. KUGLER MDL NO. 19-2875 (RBK)</b>

**CERTIFICATION OF ADAM M. SLATER IN  
FURTHER SUPPORT OF PLAINTIFFS' *DAUBERT* MOTION TO PRECLUDE  
THE OPINIONS OF DEFENSE EXPERT FENGtian XUE, PH.D.**

**ADAM M. SLATER**, hereby certify as follows:

1. I am an attorney at law within the State of New Jersey and a partner with the law firm of Mazie Slater Katz & Freeman, LLC, and serve as Plaintiffs' Co-Lead Counsel. I am fully familiar with the facts and circumstances of these actions. I make this Certification in further support of Plaintiffs' motion to exclude the testimony of Defense Expert Fengtian Xue, Ph.D.

2. Attached hereto as **Exhibit 27** is a true and accurate copy of the transcript of Dr. Stephen Hecht's January 13, 2023 deposition in this case.

3. Attached hereto as **Exhibit 28** is a true and accurate copy of the relevant excerpt from the transcript of Jucai Ge's May 27, 2022 deposition in this case.

4. Attached hereto as **Exhibit 29** is a true and accurate copy of the relevant excerpt from the transcript of Jucai Ge's May 26, 2022 deposition in this case.

**MAZIE SLATER KATZ & FREEMAN, LLC**  
Attorneys for Plaintiffs

By: /s/ Adam M. Slater

Dated: April 25, 2023